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September 30, 2016

MEMO ENDORSED

**VIA ECF and E-mail**

Honorable Kimba M. Wood  
Senior United States District Judge  
for the Southern District of New York  
United States Courthouse  
500 Pearl Street  
New York, New York 10007

Re: *United States v. Williams, Steven Brown, Gerald Seppala.*  
Docket No. S3 16 Cr. 436 (KMW)

**Letter Application For The Court's Permission For  
The Defendant Steven Brown To  
Travel to France On or About October 16-21, 2016**

Dear Judge Wood:

I write as required to seek the Court's permission for Steven Brown to attend the International Film Festival know as MIPCOM (Marché International des Programmes de Communication), an annual media trade show held in Cannes, France, this year from October 17-20.

I rely in large part on my previous letter to the Court of September 8, 2016, in which I sought to explain the international scope of Mr. Brown's business.

MIPCOM is attended by media representatives and broadcasters from all over the world who use the event as a market place to buy and sell new programs and formats for international distribution. Mr. Brown has a number of business/media productions that he wishes to be able to

Granted, for  
departure  
on Oct. 17,  
and  
return  
on Oct. 20.  
KMW

Honorable Kimba M. Wood

-2-

September 30, 2016

buy or sell during this extremely important trade show. His presence is required because of his own personal and professional skillset which he brings to his business in assessing or marketing the media products that he is interested in.

This is one of the crucial festivals mentioned (bottom page 3) of my September 8 letter to the Court that are key to success in this industry. His failure to attend would irretrievably damage his business. Mr. Brown would be prepared to appear before the Court to explain the significance to his business of this Cannes Festival and why he needs to be there. Should this be necessary, we would seek some trade secret protections for his specific projects underway at MIPCOM given the conduct of some of his detractors in the recent past.

As before, I have been in contact with AUSA Patrick Egan in order to secure his consent to this travel, but the government continues to object to Mr. Brown's international travel for the flight risk reasons such as those he articulated to Magistrate Cott after Mr. Brown's surrender to the FBI on June 28, 2016. However, I am assured by the government that it will not submit in writing any opposing paperwork to the Court regarding this application.

Furthermore, I believe that, although Pretrial Services takes no position with respect to international travel, Mr. Brown is faithfully and reliably fulfilling his responsibilities to it including the two prior occasions Mr. Brown was permitted by Your Honor to travel internationally.

Please feel free to raise any questions or concerns.

Thank you for your consideration of this request.

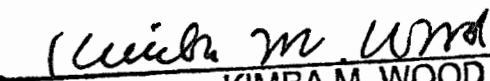
Respectfully submitted,



Walter Mack

cc: AUSA Patrick Egan (by ECF and email)  
PTSO Matthew Carter (by email)  
PTSO Natasha Ramesar (by email)

10-3-16  
SO ORDERED: N.Y., N.Y.

  
KIMBA M. WOOD  
U.S.D.J.